

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>IN RE:</b>	:	
Amy M. Acquaviva	:	Chapter 13
	:	Case No. 22-12593-ELF
Debtor(s)	:	

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**RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY FILED  
BY M&T BANK**

Debtor, Amy M. Acquaviva by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by M&T Bank hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtor avers all payments have been made to date.
7. Debtor opposes the same.
8. Denied. Debtor avers all payments have been made to date
9. Denied.
10. No response required.

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Date: 1/4/2023

/s/ Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
Attorney for the Debtor  
1500 JFK Boulevard Suite #220  
Philadelphia, PA 19102  
(215) 545-0008

**CERTIFICATE OF SERVICE**

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**Kenneth E. West, Esq.**  
Standing Chapter 13 Trustee  
Electronic Notice

**Denise Carlon, Esq.**  
Counsel for Movant *M&T Bank*  
Electronic Notice to *bkgroup@kmlawgroup.com*

Dated: January 9, 2023

/s/Brad J. Sadek, Esq.  
Brad J. Sadek, Esq.  
Attorney for Debtor(s)